



# Child Safety and Wellbeing Policy

**Policy Category:** Child Safety

**Status:** Board approved

At Sunshine Christian School, we hold the care, safety and wellbeing of children and young people as a central and fundamental responsibility of our school. The school expects that all school members uphold the school values of service, compassion, courage and forgiveness.

Non-English speakers may contact the school to seek assistance in understanding school policies and procedures.

The School has developed the following Child Safety and Wellbeing Policy.

This policy provides an overview of our School's approach to implementing Ministerial Order 1359 which sets out how the Victorian Child Safe Standards apply in school environments.

It informs our school community of everyone's obligations to act safely and appropriately towards children and guides our processes and practices for the safety and wellbeing of students across all areas of our work.

The policy forms the foundation of the School's procedures, practices, decision-making processes and ultimately the School's culture with respect to child safety. It is designed to be communicated through our public website, as well as through other mediums such as newsletters, our annual report and in induction and welcome packs and school portals for School Board members, staff and volunteers.

This policy aligns with the directions on Child Safety and Wellbeing policy provided by Lutheran Education VIC, NSW, TAS and ACT Ltd (LEVNT) to provide minimum directions on Child Safety and Wellbeing in our schools, promote consistency, good governance and best practice in our system and School policy.

The School's Child Safety and Wellbeing Policy has been approved by the School's School Board and is reviewed every two (2) years or after any significant child safety incident by the Board.

## 1. Policy Objective

### 1.1. Scope

The purpose of this Policy is to demonstrate the strong commitment of the School to the care, safety and wellbeing of all students at our School. It provides an outline of the policies, procedures, actions and strategies that will be implemented to ensure that a child safe culture is championed and modelled at all levels of the School, to keep students safe from harm, including all forms of abuse in our School environment, on campus, online and in other locations provided by the School.

This Policy takes into account relevant legislative requirements within the state of Victoria, including the specific requirements of the Child Safe Standards as set out in Ministerial Order

No. 1359. This policy outlines the child safety and wellbeing principles to be applied in the development and content of all child safety policies, guidelines and associated documentation developed for and on behalf of the School.

This policy applies to all School staff, including School employees, volunteers and contractors with roles and accountabilities outlined in this policy document (whether or not they work in direct contact with students). This policy applies in all School environments (physical, virtual and online) both on and off site. This policy provides direction to School staff, contractors, students, parents and volunteers.

All policy must be applied in the manner described in the School Child Safety Code of Conduct and Staff Code of Conduct.

## 2. Policy Principles

### 2.1. Policy Roles and Responsibilities

Everyone employed or volunteering at the School has a responsibility to understand the important and specific role they play individually and collectively to ensure a child safe culture in which the wellbeing and safety of all students is at the forefront of all they do and every decision they make.

The School has allocated roles and responsibilities for child safety and wellbeing as follows:

Role	Responsibility
<b>Lutheran Education VIC, NSW, TAS at ACT Ltd (LEVNT)</b>	<p>LEVNT is responsible for providing any applicable Lutheran Education minimum directions on policy content and principles, support in form of templates and tools to direct efficiency and guide consistent, best practice and compliance policy and procedure.</p> <p>When appointing school board members, LEVNT ensures that selection, supervision, and management practices are child safe.</p>
<b>School Board</b>	<p>School Board are responsible for establishing School policy and templates, minimum (and mandatory) requirements, directives and guidance for Child Safety and Wellbeing School policy.</p> <p>The School Board is required to support the Principal in their role of implementing policy. This is to leverage their expertise on:</p> <ul style="list-style-type: none"> <li>• Culture and alignment</li> <li>• Community engagement and input</li> <li>• Communication and awareness</li> <li>• Resourcing and embedding</li> </ul> <p>In performing the functions and powers given to them under the Education and Training Reform Act 2006, school board directors will:</p> <ul style="list-style-type: none"> <li>• Champion and promote a child safe culture with the broader school community</li> </ul>

Role	Responsibility
	<ul style="list-style-type: none"> <li>• Ensure that child safety is a regular agenda item at School Board meetings</li> <li>• Undertake annual training on child safety (e.g. PROTECT: Child Safe Standards School Board Training)</li> <li>• Approve updates to, and act in accordance with the Child Safety Code of Conduct to the extent that it applies to school board directors</li> <li>• When nominating school board members, ensure that selection, supervision, and management practices are child safe.</li> </ul>
<p><b>Principal / School Board</b></p>	<p>Principal is responsible for the implementation of School policy and the development and deployment of policies and procedures in accord with School policies.</p> <p>A Principal is responsible to the School Board for ensuring every member of the School community understands and follows all policy and procedures including approvals of policy and procedure and variations.</p> <p>The Principal has the overall leadership role in monitoring and responding to the policy, procedures and practices for child safety and wellbeing at the School in accordance with this Policy.</p> <p>The Principal, the school Board and school leaders recognise their particular responsibility to ensure the development of preventative and proactive strategies that promote a culture of openness, awareness of and shared responsibility for child safety and wellbeing. Responsibilities include:</p> <ul style="list-style-type: none"> <li>• Creating an environment for children and young people to be safe and to feel safe</li> <li>• Upholding high principles and standards for all staff, pastors, volunteers and contractors</li> <li>• Promoting models of behaviour between adults and children and young people based on mutual respect and consideration</li> <li>• Ensuring thorough and rigorous practices are applied in the recruitment, screening and ongoing professional learning of staff and volunteers</li> <li>• Ensuring that School personnel have regular and appropriate knowledge and ongoing training to assist them to prevent, identify, report and address child safety and wellbeing matters</li> <li>• Ensuring that the School has in place appropriate risk management strategies and practices that focus on preventing, identifying and mitigating risks related to child safety and wellbeing in the school environment</li> <li>• Providing regular opportunities to clarify and confirm legislative obligations, policy and procedures in relation to children and young people's protection and wellbeing</li> </ul> <p>State specific section:</p>

Role	Responsibility
	<ul style="list-style-type: none"> <li>• Ensuring the School meets the specific requirements of the Victorian Child Safe Standards as set out in Ministerial Order No. 1359</li> <li>• Ensuring the school takes specific action to protect children from abuse in line with the three new criminal offences introduced under the Crimes Act 1958 (Vic) and in line with (PROTECT: Identifying and responding to all forms of abuse in Victorian schools)]</li> <li>• Ensuring the School understands and reports all matters that may constitute reportable conduct under the Reportable Conduct Scheme and in accordance with the School’s Reportable Conduct Policy</li> <li>• Sharing information under legislated information sharing schemes (CISS and FVISS) in accordance with the School’s prescribed role as an ISE</li> <li>• Ensuring that the School monitors and reviews the risks related to child safety and wellbeing, including evaluating the effectiveness of the implementation of its risk controls, on an annual basis.</li> </ul>
<b>School/ School Staff</b>	<p>Responsibilities of school staff (school employees, contractors and pastors) and volunteers include:</p> <ul style="list-style-type: none"> <li>• Treating children and young people with dignity and respect, acting with propriety, providing a duty of care, and protecting children and young people in their care</li> <li>• Following the legislation and internal School policies, procedures and processes in the course of their work, if they form a reasonable belief that a child or young person has been or is being abused or neglected</li> <li>• Providing a physically and psychologically safe environment where the wellbeing of children and young people is nurtured</li> <li>• Undertaking regular training and education in order to understand their individual responsibilities in relation to child safety, and the wellbeing of children and young people, including ways to prevent, identify and mitigate risks relating to child safety and wellbeing</li> <li>• Assisting children and young people to develop positive, responsible and caring attitudes and behaviours which recognise the rights of all people to be safe and free from abuse</li> <li>• Following the School’s Child Safety Code of Conduct</li> <li>• Where risks of child abuse are identified, ensuring that action is taken to mitigate against those risks and that risks and actions are appropriately recorded.</li> </ul>
<b>Child Safety Officer</b>	<p>We have appointed 3 Child Safety Officers.</p> <p>The responsibilities of the Child Safety Officers include:</p> <ul style="list-style-type: none"> <li>• Promote Child Safety Culture <ul style="list-style-type: none"> <li>○ Promote child safety and wellbeing. For example, at staff and parent meetings, through newsletters and staff bulletins.</li> <li>○ Ensure the school’s child safety policies and procedures are current and fit for purpose, are publicly accessible, are known and implemented.</li> <li>○ Promote a culture of listening to students and families and acting on their child safety concerns.</li> </ul> </li> </ul>

Role	Responsibility
	<ul style="list-style-type: none"> <li>○ Support staff and volunteers to focus on the child safety needs of vulnerable students.</li> <li>● Provide Support and Guidance <ul style="list-style-type: none"> <li>○ Be a point of contact for child safety concerns for staff, volunteers and students.</li> <li>○ Provide guidance to students, staff and volunteers on child safety policies and procedures.</li> <li>○ Work with school leadership to respond to child safety incidents.</li> <li>○ Maintain current skills and knowledge to support child safety and wellbeing, including: child-focused complaint processes, reporting obligations and the Four Critical Actions, student rights, participation and empowerment, Aboriginal cultural safety and inclusive practices to meet students diverse needs, child safety risk management including online safety, child safety information sharing and record-keeping obligations, working with relevant agencies to refer students and families to appropriate support, keeping across emerging research and best practice guidance in child safety and wellbeing.</li> </ul> </li> </ul> <p>Our School website and newsletter will provide information to keep parents and carers informed of child safety and wellbeing commitments, procedures and arrangements and the Child Safety Officer/Lead.</p> <ul style="list-style-type: none"> <li>● Train and Educate <ul style="list-style-type: none"> <li>○ Provide child safety induction programs for new school staff, volunteers and school board directors.</li> <li>○ Provide child safety training for school staff, volunteers and school board directors.</li> <li>○ Ensure mandatory reporters complete the annual mandatory reporting training.</li> <li>○ Provide child safety updates and information to staff and volunteers, as needed.</li> </ul> </li> <li>● Monitor, Review and Report <ul style="list-style-type: none"> <li>○ Record child safety complaints and concerns, and analyse trends as needed.</li> <li>○ Coordinate reviews following significant safety incidents and recommend improvements.</li> <li>○ maintain the school's child safety risk register with the school leadership team.</li> <li>○ coordinate child safety policy and practice reviews in consultation with the school community.</li> <li>○ maintain detailed, accurate, secure written records of concerns and referrals.</li> </ul> </li> </ul> <p>Our Principal and Child Safety Officers are the first point of contact for child safety concerns or queries and for coordinating responses to child safety incidents.</p>

Role	Responsibility

## 2.2. Policy Definitions

**Child** – means a child or young person who is under the age of 18 years.

**Child Abuse** – includes:

- (a) any act committed against a child involving:
  - (i) a sexual offence
  - (ii) an offence under section 49B(2) of the Crimes Act 1958 (grooming)
- (b) the infliction, on a child, of:
  - (i) physical violence
  - (ii) serious emotional or psychological harm
- (c) serious neglect of a child.

**Child-Connected Work** – Child-connected work means:

- a) work authorised by the School Board and performed by an adult in a School environment while children are present or reasonably expected to be present

Note: Working with Children clearance is required by law only for people who engage in child-related work. Schools and school boarding premises may also choose to require suitability checks (including Working with Children clearance) for visitors and volunteers engaging in child-connected work.

**Child-Related Work** – The Worker Screening Act 2020 defines ‘child-related work’ as work which usually involves (or is likely to involve) direct contact with a child, irrespective of whether that contact is supervised or not, and in any of the child-related occupational fields listed in the Act.

The definition of direct contact includes oral, written or electronic communication as well as face-to-face and physical contact. ‘Child-related work’ may be either paid or unpaid (voluntary).

There are exemptions from the Act including people under 18 years of age, parent volunteers whose child ordinarily participates in the activity, sworn police officers, teachers currently registered with the Victorian Institute of Teaching, and visiting workers who do not ordinarily reside and perform child-related work in Victoria, among others.

**Child Safety** – encompasses matters related to protecting all children from child abuse, managing the risk of child abuse, providing support to a child at risk of child abuse, and responding to suspicions, incidents, disclosures or allegations of child abuse (Victoria - Ministerial Order No. 1359).

**Child Neglect** – includes a failure to provide the child with an adequate standard of nutrition, medical care, clothing, shelter or supervision to the extent that the health and physical

development of the child is significantly impaired or placed at serious risk. ([PROTECT: Identifying and responding to all forms of abuse in Victorian schools](#))

**Child Physical Abuse** – generally consists of any non-accidental infliction of physical violence on a child by any person. ([PROTECT: Identifying and responding to all forms of abuse in Victorian schools](#))

**Child Sexual Abuse** – is when a person uses power or authority over a child to involve them in sexual activity. It can include a wide range of sexual activity and does not always involve physical contact or force. ([PROTECT: Identifying and responding to all forms of abuse in Victorian schools](#))

**Emotional Child Abuse** – occurs when a child is repeatedly rejected, isolated or frightened by threats, or by witnessing family violence. ([PROTECT: Identifying and responding to all forms of abuse in Victorian schools](#))

**Gender** – Identity refers to the way in which a person understands, identifies or expresses their masculine or feminine characteristics within a particular sociocultural context.

**Grooming** – is when a person engages in predatory conduct to prepare a child for sexual activity at a later date. It can include communication and/or attempting to befriend or establish a relationship or other emotional connection with the child or their parent/carer. ([PROTECT: Identifying and responding to all forms of abuse in Victorian schools](#))

**Mandatory Reporting** – the legal requirement under the Children, Youth and Families Act 2005 (Vic) to protect children from harm relating to physical and sexual abuse. The Principal, registered teachers and early childhood teachers, school counsellors, pastors, medical practitioners and nurses at a school are mandatory reporters under this Act. ([PROTECT: Identifying and responding to all forms of abuse in Victorian schools](#))

**Reasonable Belief: Mandatory Reporting** – when school staff are concerned about the safety and wellbeing of a child or young person, they must assess that concern to determine if a report should be made to the relevant agency. This process of considering all relevant information and observations is known as forming a reasonable belief. A ‘reasonable belief’ or a ‘belief on reasonable grounds’ is not the same as having proof, but is more than mere rumour or speculation. A reasonable belief is formed if a reasonable person in the same position would have formed the belief on the same grounds. ([PROTECT: Identifying and responding to all forms of abuse in Victorian schools](#))

**Reasonable Belief: Reportable Conduct Scheme** – when a person has a reasonable belief that a worker/volunteer has committed reportable conduct or misconduct that may involve reportable conduct. A reasonable belief is more than suspicion and there must be some objective basis for the belief. It does not necessitate proof or require certainty.

NOTE: the difference between the reasonable belief definitions under mandatory reporting and the reportable conduct scheme is the category of persons who are required to, or can, form the reasonable belief which forms the basis for a report.

**Reportable Conduct** – five types of reportable conduct are listed in the Child Wellbeing and Safety Act 2005 (Vic) (as amended by the Children Legislation Amendment (Reportable Conduct) Act 2017). These include:

1. Sexual offences (against, with or in the presence of a child)
2. Sexual misconduct (against, with or in the presence of a child)

3. Physical violence (against, with or in the presence of a child)
4. Behaviour that is likely to cause significant emotional or psychological harm
5. Significant neglect.

**School Environment** – means any of the following physical, online or virtual places used during or outside School hours:

- A campus of the School
- Online or virtual school environments made available or authorised by the School for use by a child or student (including email, intranet systems, software, applications, collaboration tools and online services)
- Other locations provided by the School or through a third-party provider for a child or student to use including, but not limited to, locations used for School camps, approved homestay accommodation, delivery of education and training, sporting events, excursions, competitions and other events) (Ministerial Order No. 1359).

**School Staff** – means an individual working in a School environment who is:

- Directly engaged or employed by a School Board
- A contracted service provider engaged by the School (whether or not a body corporate or any other person is an intermediary) engaged to perform child-related work for the School
- A pastor, minister of religion, a religious leader or an employee or officer of a religious body associated with LEVNT (Ministerial Order No. 1359).

**School Board / School Governing Authority** – School Board is the school governing authority and this means:

- a) The proprietor of a School, including a person authorised to act for or on behalf of the proprietor
- b) The governing body for a School (however described), as authorised by the proprietor of a school or the ETR Act
- c) The principal, as authorised by the proprietor of a School, the School governing body, or the ETR Act.

**Student** – Student means a person who is enrolled at or attends the School or a student at the School boarding premises.

**Volunteer** – means a person who performs work without remuneration or reward for the School in the School environment.

### **2.3. LEVNT Policy**

The Executive Director is to be kept informed by the Principal on the following:

- Serious child safety concerns, risks or complaints
- Serious harm or injury to a child due to School actions or activities
- Attestation on child safety compliance with MO 1359 on annual basis
- Reportable conduct concerns and reports

- Any actions, activities or risks related to actual or reasonably foreseeable media attention or reputation impacts for LEVNT or the School

## **2.4. Policy Principles**

The following principles underpin our commitment to child safety and wellbeing at the School:

- All students deserve, as a fundamental right, safety and protection from all forms of abuse and neglect.
- Our School works in partnership with families and the community to ensure they are engaged in decision-making processes, particularly those that have an impact on child safety and wellbeing and protection.
- All students have the right to a thorough and systematic education in all aspects of personal safety, in partnership with their parents/guardians/carers.
- All adults in our school, including teaching and non-teaching staff, pastors, volunteers and contractors, have a responsibility to care for children and young people, to positively promote their wellbeing, to identify and mitigate risks related to child safety and wellbeing in the school environment and to protect them from any kind of harm or abuse.
- The policies, procedures, guidelines and codes of conduct for the care, wellbeing and protection of students are based on honest, respectful and trusting relationships between adults and children and young people.
- Policies and practices demonstrate compliance with legislative requirements and cooperation with the governments, the police and human services agencies.
- All persons involved in situations where harm is suspected or disclosed must be treated with sensitivity, dignity and respect.
- All members of the School community (including students and their families) are kept informed of child safety and wellbeing matters (where appropriate) and are involved in promoting child safety and wellbeing.
- Staff, pastors, volunteers, contractors, parents and students should feel free to raise concerns about child safety and wellbeing, knowing these will be taken seriously by School leadership.
- Appropriate confidentiality will be maintained, with information being provided to those who have a right or a need to be informed, either legally (including under legislated information sharing schemes being Child Information Sharing Scheme (CISS) or Family Violence Information Sharing Scheme (FVISS)) or pastorally.

## **2.5. Policy Commitment**

All students enrolled at the School have the right to feel safe and be safe. The safety and wellbeing of children in our care will always be our first priority and we do not and will not tolerate child abuse. We aim to create a child-safe and child-friendly environment where children are free to enjoy life to the full without any concern for their safety. There is particular attention paid to the most vulnerable children, including Aboriginal and Torres Strait Islander children, children from culturally and/or linguistically diverse backgrounds, children with a disability, children who are unable to live at home, international students, and LGBTIQ+ students.

The School is a child safe organisation which welcomes all children, young people and their families. We are committed to providing environments where our students are safe and feel safe, where their participation is valued, their views respected, and their voices are heard about decisions that affect their lives. Our child safe policies, strategies and practices are inclusive of

the needs of all children and students. We have no tolerance for child abuse and take proactive steps to identify and manage any risks of harm to students in our school environments.

We promote positive relationships between students and adults and between students and their peers. These relationships are based on trust and respect. We take proactive steps to identify and manage any risk of harm to students in our school environment. When child safety concerns are raised or identified, we treat these seriously and respond promptly and thoroughly.

Particular attention is given to the child safety needs of Aboriginal students, those from culturally and linguistically diverse backgrounds, international students, students with disabilities, those unable to live at home, children and young people who identify in diverse ways including but limited, to their sexual orientation, sex and/or gender, and other students experiencing risk or vulnerability. Inappropriate or harmful behaviour targeting students based on these or other characteristics, such as racism or homophobia, are not tolerated at our school, and any instances identified will be addressed with appropriate consequences.

Child safety is a shared responsibility. Every person involved in our school has an important role in promoting child safety and wellbeing and promptly raising any issues or concerns about a child's safety. We are committed to regularly reviewing our child safe practices, and seeking input from our students, families, staff, and volunteers to inform our ongoing strategies.

#### **2.5.1. Policy Commitment to our Students**

- We commit to the safety and wellbeing of all children and young people enrolled in our School.
- We commit to providing children and young people with positive and nurturing experiences.
- We commit to listening to children and young people, and empowering them by ensuring they understand their rights (including to safety, information and participation), and by taking their views seriously and addressing any concerns that they raise with us.
- We commit to taking action to ensure that children and young people are protected from abuse or harm.
- We commit to ensuring the needs of all children and young people enrolled in our School is met, including those who are most vulnerable.
- We commit to recognising the importance of friendships and to encouraging support from peers, to help children and students feel safe and less isolated.
- We commit to developing a culture that facilitates and provides opportunities for child and student participation, and that strengthens the confidence and engagement of children and students by being responsive to their input.
- We commit to teaching children and young people the necessary skills and knowledge to understand and maintain their personal safety and wellbeing.
- We commit to seeking input and feedback from students regarding the creation of a safe school environment.

#### **2.5.2. Policy Commitment to Parents, Guardians and Carers**

- We commit to communicating honestly and openly with parents, guardians and carers about the wellbeing and safety of their children.
- We commit to engaging with, and listening to, the views of parents, guardians and carers about our child safety and wellbeing practice, policies and procedures.

- We commit to transparency in our decision-making with parents, guardians and carers where it will not compromise the safety of children or young people.
- We commit to open engagement and communication with parents, guardians and carers about our child safe approach and our operations and governance related to child safety and wellbeing.
- We commit to ensuring that relevant information relating to child safety and wellbeing is accessible to parents, guardians and carers.
- We commit to acknowledging the cultural diversity of students and families, and being sensitive to how this may impact on student safety issues.
- We commit to continuously reviewing and improving our systems to protect children from abuse.

### **2.5.3. Policy Commitment to our School Staff (Employees, Volunteers, Contractors)**

- We commit to providing all School staff with the necessary support to enable them to fulfil their roles, and to ensure that staff are attuned to signs of harm and are able to facilitate child-friendly ways for children and students to express their views, participate in decision-making and raise their concerns. This will include regular and appropriate learning opportunities.
- We commit to providing regular opportunities to clarify and confirm policy and procedures in relation to child safety and wellbeing, and young people's protection and wellbeing. This will include annual training in the principles and intent of the Child Safety and Wellbeing Policy and Child Safety Code of Conduct, and staff responsibilities to report concerns.
- We commit to listening to all concerns voiced by School staff, pastors, volunteers and contractors about keeping children and young people safe from harm.
- We commit to providing opportunities for School school employees, volunteers, contractors and pastors to receive formal debriefing and counselling arising from incidents of the abuse of a child or young person.

### **2.6. Expectation of School Staff and Volunteers (Child Safety Code of Conduct)**

At the School, we expect School employees, Board members, volunteers, contractors and pastors to proactively ensure the safety and wellbeing of students at all times, to identify concerns about child safety and wellbeing and to take appropriate action if there are concerns about the safety and wellbeing of any child at the School. All School staff must remain familiar with the relevant laws, the code of conduct, and policies and procedures in relation to child protection, and comply with all requirements.

We have developed a [Child Safety Code of Conduct](#) which recognises the critical role that School staff play in protecting the students in our care and establishes clear expectations of School employees, Board members, volunteers, contractors and pastors for appropriate behaviour with children in order to safeguard them against abuse and/or neglect.

Our Code also protects School staff and volunteers through clarification of acceptable and unacceptable behaviour.

While we set out circumstances in which the legislation requires reporting of particular child protection issues, the School requires you to report any concern you may have about the safety, welfare or wellbeing of a child or young person to the Principal [or Deputy Principal]. If the concern relates to harm caused by a member of staff or a volunteer you are required to report

this directly to the Principal. If the allegation involves the Principal, you are required to report to the Chair of the School Board.

## **2.7. Student Safety and Participation**

At the School we actively encourage all students to openly express their views and feel comfortable about giving voice to the things that are important to them.

We teach students about what they can do if they feel unsafe and enable them to understand, identify, discuss and report their concerns. We listen to and act on any concerns students, or their parents or carers, raise with us.

The curriculum design integrates appropriate knowledge and skills to enhance students' understanding of being safe, as well as their understanding of their rights to safety, information and participation. Teaching and learning strategies that acknowledge and support student agency and voice are implemented. We ensure that students are offered access to sexual abuse prevention programs and to relevant related information in an age-appropriate way.

We have developed appropriate education about:

- Standards of behaviour for students attending our School
- Healthy and respectful relationships (including sexuality)
- Resilience
- Child abuse awareness and prevention.

We have also developed curriculum planning documents that detail the strategies and actions the School takes to implement its obligations to ensure that:

- Children and students are informed about all of their rights, including to safety, information and participation
- The importance of friendship is recognised and support from peers is encouraged, to help children and students feel safe and be less isolated
- Staff and volunteers are attuned to signs of harm and facilitate child-friendly ways for children and students to express their views, participate in decision-making and raise their concerns
- We have strategies in place to develop a culture that facilitates participation and is responsive to the input of children and students
- We provide opportunities for children and students to participate and is responsive to their contributions to strengthen confidence and engagement
- Students are offered access to sexual abuse prevention programs and to relevant information in an age-appropriate way.

## **2.8. Reporting and Responding**

Our School creates records relevant to any child safety complaints, disclosures or breaches of the Child Safety Code of Conduct, and maintains and disposes of those records in accordance with security and privacy requirements and Public Record Office Victoria Recordkeeping Standards (including minimum retention periods). Our School complies with legal obligations that relate to managing the risk of child abuse under the Children, Youth and Families Act 2005 (Vic), the Crimes Act 1958 (Vic), the Child Wellbeing and Safety Act 2005 (Vic).

Child protection reporting obligations fall under separate pieces of legislation with differing reporting requirements.

Our School [PROTECT: Identifying and Responding to Abuse – Reporting obligations](#) sets out the actions required under the relevant legislation when there is a reasonable belief that a child at our school is in need of protection or a criminal offence has been committed, and provides guidance and procedures on how to make a report.

Our policy assists staff, volunteers and families to:

- Identify the indicators of a child or young person who may be in need of protection
- Understand how a reasonable belief is formed under the reportable conduct scheme as well as mandatory reporting
- Make a report of a child or young person who may be in need of protection
- Comply with mandatory reporting obligations under child protection law, and their legal obligations relating to child abuse and grooming under criminal law
- Understand and comply with information sharing and recordkeeping obligations
- Comply with reporting obligations under the reportable conduct scheme including obligations to report and investigate allegations of reportable conduct.

Our School has also established additional internal procedures and processes to help ensure that appropriate action is taken to prevent, identify and respond to concerns about the wellbeing and/or safety of a student.

Our School is a prescribed Information Sharing Entity (ISE) meaning that, where legislated requirements are met, it is able to share confidential information with other ISEs to promote child wellbeing or safety under the CISS or FVISS.

At Sunshine Christian School, if any member of our school community has concerns for a child's safety they need to discuss, they can notify the school Principal, the Deputy Principal or the designated Child Safety and Wellbeing Lead/Officer, Mr Pelton.

If the Principal or Child Safety and Wellbeing Officer is not available, then it should be discussed with a member of the school leadership team. Alternatively, any member of the school community may report directly to the responsible authority.

The staff member, supported by the Principal or designated Child Safety and Wellbeing Officer will follow the step-by-step guide to making a report as outlined in the Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse.

## **2.9. Screening and Recruitment of School Staff**

The School will apply thorough and rigorous screening processes in the recruitment of employees and volunteers involved in child-connected work. Our commitment to child safety and wellbeing and our screening requirements are included in all advertisements for such employee, contractor and volunteer positions, and all applicants are provided with copies of the school's Child Safety Code of Conduct and the Child Safety and Wellbeing Policy.

Each job description for staff involved in child-connected work has a clear statement that sets out the requirements, duties and responsibilities regarding child safety and wellbeing for those in that role and the occupant's essential qualifications, experience and attributes in relation to child safety and wellbeing.

When recruiting and selecting employees, contractors and volunteers involved in child-connected work, we ensure that we gather, verify and record the following information about any person we propose to engage:

- Confirm the applicant's Working with Children Check and National Police Check status and/or professional registration (as relevant and subject to ongoing monitoring)
- Obtain proof of personal identity and any essential or relevant professional or other qualifications
- Verify the applicant's history of work involving children
- Obtain references that address the applicant's suitability for the job and working with children.

We will also ensure that appropriate supervision or support arrangements are in place in relation to the induction of new school staff into the school's policies, codes, practices and procedures governing child safety and wellbeing and child-connected work.

We have procedures and processes for monitoring and assessing the continuing suitability of school staff and volunteers to work with children, including regular reviews of the status of Working with Children Checks and staff professional registration requirements such as Victorian Institute of Teaching (VIT) registration.

All newly appointed staff will be expected to participate in our child safety and wellbeing induction program. The program will include a focus on:

- The Child Safety and Wellbeing Policy (this document)
- The Child Safe Code of Conduct
- The Responding to and Reporting Allegations of Child Abuse Procedure and any other child safety and wellbeing information that school leadership considers appropriate to the nature of the role.

The School's position is that all employees of the school and volunteers over the age of 18 who are not parents or close relatives of a child at the school must have a WWCC. All volunteers attending overnight school excursions (e.g. school camps) must have a valid WWCC.

## **2.10. Child Safety and Wellbeing (Education and Training for School Staff)**

The School provides employees, volunteers and pastors with regular and appropriate opportunities to develop their knowledge of, openness to and ability to address child safety and wellbeing matters. This includes induction, ongoing training and professional learning to ensure that everyone understands their professional and legal obligations and responsibilities, and the procedures for reporting suspicion of child abuse and neglect.

At least annually, our professional learning and training addresses:

- Staff's individual and collective obligations and responsibilities for managing the risk of child abuse
- Preventing, identifying and mitigating child abuse risks in the school environment without compromising a child or student's right to privacy, access to information, social connections and learning opportunities
- The reportable conduct scheme

- Our school’s current child safety standards (including this Policy, the Child Safety Code of Conduct and any other policies and procedures relating to child safety and wellbeing, including in relation to managing complaints and concerns related to child abuse)
- Guidance on recognizing indicators of child harm including harm caused by other children and students
- Guidance on responding effectively to issues of child safety and wellbeing and supporting colleagues who disclose harm
- Guidance on how to build culturally safe environments for children and students
- Guidance on their information sharing and recordkeeping obligations, including under the Public Record Office Victoria Recordkeeping Standards.

### **2.11. Diversity and Equity (Strategies and Actions)**

At the School, we are committed to ensuring that equity is upheld, and that diverse needs are respected in policy and practice. We aim to ensure that:

- All School staff and volunteers understand the diverse circumstances of children and students
- Our school provides support and responds to vulnerable children and students
- Children, students, staff, volunteers and the school community have access to information, support and complaints processes in ways that are culturally safe, accessible and easy to understand
- The School pays particular attention to the needs of students with disability, students from culturally and linguistically diverse backgrounds, students who are unable to live at home, international students, and LGBTIQ+ students
- The School pays particular attention to the needs of Aboriginal students and provides and promotes a culturally safe environment for them.

### **2.12. Family Engagement (Strategies and Actions)**

The School ensures that families, carers and other members of the school community are informed about relevant child safety and wellbeing matters and are involved in the promotion of child safety and wellbeing at the School. We aim to ensure that:

- Families participate in decisions relating to child safety and wellbeing which affect their child
- We engage and openly communicate with families, carers and other members of the School community about our child safe approach
- All members of the School community have access to information relating to child safety and wellbeing
- Families, carers and other members of the School community have the opportunity to provide input into the development and review of the School’s child safety and wellbeing policies and practices
- Families, carers and other members of the School community are informed about the operations and governance of the School in relation to child safety and wellbeing.

### **2.13. Risk Management**

At the School, we are committed to proactively and systematically identifying and assessing risks to student safety across our whole school environment, and reducing or eliminating (where possible) all potential sources of harm. We document, implement, monitor and annually review

our risks and risk management strategies for child safety and wellbeing, evaluate the effectiveness of the implementation of our risk controls and ensure that the strategies change as needed and as new risks arise.

At our School we identify, assess and manage risks to child safety and wellbeing in our physical and online school environments. These risks are managed through our child safety and wellbeing policies, procedures and practices, and in our activity specific risk registers, such as those we develop for off-site overnight camps, adventure activities and facilities and services we contract through third party providers for student use.

Our [Child Safety Risk Register](#) is used to record any identified risks related to child abuse or harm alongside actions in place to manage those risks. Our School leadership team will monitor and evaluate the effectiveness of the actions in the Child Safety Risk Register at least annually.

Refer to the Child Safe Standards Action Plan for further details about the actions the School does to meet this standard.

## **2.14. Policy Awareness and Training**

Ongoing training and education are essential to ensuring that staff understand their roles and responsibilities and develop their capacity to effectively address child safety and wellbeing matters.

### School Board

To ensure our School Board is equipped with the knowledge required to make decisions in the best interests of student safety and wellbeing, and to identify and mitigate child safety and wellbeing risks in our School environment, the Board is trained at least annually. Training includes guidance on:

- Individual and collective obligations and responsibilities for implementing the Child Safe Standards and managing the risk of child abuse
- Child safety and wellbeing risks in our school environment
- School child safety and wellbeing policies, procedures, codes and practices.

### School Employees

The School provides all employees with a copy of this policy and will provide all employees with the opportunity to participate in child protection training annually.

All new employees must read this policy and sign an acknowledgement that they have read and understood the policy. All employees must participate in annual child protection training and additional training, as directed by the Principal. The training compliments this policy and provides information to employees about their legal responsibilities related to child protection and school expectations, including: Mandatory reporting; Reportable conduct; Working With Children Check; Professional boundaries.

The School is committed to communicating our child safety strategies to the school community through:

- Ensuring that key child safety and wellbeing policies are available on our website including the Child Safety and Wellbeing Policy (this document), Child Safe Code of Conduct, and the Responding to and Reporting Allegations of Child Abuse Procedure
- Displaying PROTECT and Child Safety Officer posters around the school
- Providing updates in our school newsletter and our school policy and parent portals
- Ensuring that child safety is a regular agenda item at school leadership meetings, staff meetings and School Board meetings.

## **2.15. Complaints and Reporting Processes**

The School fosters a culture that encourages staff, volunteers, students, parents, and the school community to raise concerns and complaints. This makes it more difficult for breaches of the code of conduct, misconduct or abuse to occur and remain hidden.

Refer to the Complaints and Grievances policy and Child Safety Risk Register for further details about the actions and mitigations the School does to manage these processes.

## **2.16. Privacy and Information Sharing**

The School collects, uses, and discloses information about children and their families in accordance with Victorian and National privacy laws, and other relevant laws. For information on how our School collects, uses and discloses information refer to the School's Privacy Policy.

## **2.17. Records Management**

The School is committed to best practice record keeping about child safety incidents and concerns in accordance with Public Record Office Victoria Recordkeeping Standards (including minimum retention periods).

The School records all internal and external reports of child safety incidents and concerns, as well as any other responses by the School using PROTECT Recording your actions: Responding to suspected child abuse - A Template for Victorian Schools or, if the incident or concern involves student sexual offending, the PROTECT Responding to Suspected Student Sexual Offending - A Template for Victorian Schools.

When keeping records of child safety incidents or concerns, the School maintains confidentiality and privacy for students and families in accordance with federal and state privacy legislation.

# **3. Policy Compliance**

## **3.1. Policy Breach**

As policy documents provide direction and protection for staff, parents and students of Sunshine Christian School it is an important requirement that those that are high and medium risk contain a statement on the implications of a breach.

All breaches, near misses and risks related to this policy should be reported to the Principal.

Compliance with this policy will be monitored by the Principal and Assistant Principal and this may include independent audits and reviews.

## 4. Related Policies, Procedures and Legislation

### 4.1. Sunshine Christian School Policy and Procedure Linkage

### 4.2. Board Policy Linkage

### 4.3. Lutheran Education Policy Linkage

- Child Safety and Wellbeing Policy template

### 4.4. Related Legislative Instruments

- Children, Youth and Families Act 2005 (Vic.)
- Child Wellbeing and Safety Act 2005 (Vic.)
- Worker Screening Act 2020 (Vic.)
- Education and Training Reform Act 2006 (Vic.)
- Education and Training Reform Regulations 2017 (Vic.)
- Equal Opportunity Act 2010 (Vic.)
- Privacy Act 1988 (Cth)
- Public Records Act 1973 (Vic)
- Crimes Act 1958 (Vic.) – Three new criminal offences have been introduced under this Act:
  - Failure to disclose offence: Any adult who forms a reasonable belief that a sexual offence has been committed by an adult against a child under 16 has an obligation to report that information to police. Failure to disclose the information to police is a criminal offence.
  - Failure to protect offence: This offence will apply where there is a substantial risk that a child under the age of 16 under the care, supervision or authority of a relevant organisation will become a victim of a sexual offence committed by an adult associated with that organisation. A person in a position of authority in the organisation will commit the offence if they know of the risk of abuse and have the power or responsibility to reduce or remove the risk, but negligently fail to do so.
  - Grooming offence: This offence targets predatory conduct designed to facilitate later sexual activity with a child. Grooming can be conducted in person or online, for example via interaction through social media, web forums and emails.

### 4.5. Further Information

If you would like further information about the way the School manages its policy management framework, the first point of contact is with the Principal.

### Policy Control & Approval Information

Policy Category	Policy Risk Rating	Approver	Date Approved	Next Review
Child Safety	High	Board	26/03/2025	03/2027